

# **EXHIBIT 3**

**Redacted Version of  
Document Sought to  
be Sealed**

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION**

CHASOM BROWN, et al., individually and  
on behalf of all similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**SUPPLEMENTAL DECLARATION OF EUGENE LEE**

1. I am a Google engineer and a team lead for Google's [REDACTED] teams, which are responsible for the logs processing backend for Ads at Google. In this capacity, I regularly work with [REDACTED] logs and [REDACTED] logs in the course of my day-to-day responsibilities. I have been a Google employee for more than 10 years. I make this declaration of my own personal, firsthand knowledge, and if called as a witness, I could and would testify competently thereto.

2. On November 30, 2022, I submitted a declaration regarding certain [REDACTED] logs and [REDACTED] logs in connection with Google's response to the Court's October 27, 2022 Order to Show Cause.

3. To confirm the names of logs that contribute records to the [REDACTED] logs and [REDACTED] logs at issue, I consulted documentation for those logs called [REDACTED], which are [REDACTED]. [REDACTED] engineers frequently reference [REDACTED] when working with [REDACTED] logs and [REDACTED] logs like the ones discussed in my November 30, 2022 declaration. The [REDACTED] I considered are attached here as Exhibit A.

4. Paragraph 17 of my November 30, 2022 declaration states that the [REDACTED] logs identified in paragraph 16 [REDACTED] (which are labeled as

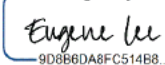
1 “ [REDACTED] ” in the [REDACTED] in Exhibit A) in paragraphs 17 and 19. In addition  
2 to a subset of the primary log types listed in paragraph 17 and 19, [REDACTED] of the logs listed in paragraph  
3 16 ([REDACTED] and [REDACTED]  
4 [REDACTED]) may also contain records from the primary log type [REDACTED]; and  
5 [REDACTED] of the logs listed in paragraph 16 ([REDACTED]) may  
6 also contain records from the primary log type [REDACTED]. See  
7 Exhibit A. The information that an ad was flagged as spam is taken from a separate log or logs  
8 labeled “ [REDACTED] ” in the [REDACTED] in Exhibit A.

9 5. Paragraph 17 of my November 30, 2022 declaration also states that the  
10 “ [REDACTED] ” logs identified in the preceding paragraph further annotate certain  
11 “ [REDACTED] ” logs. I wish to clarify that [REDACTED] logs ([REDACTED]  
12 [REDACTED] and [REDACTED]) primarily annotate  
13 “ [REDACTED] ” logs. The other [REDACTED] “ [REDACTED] ” logs ([REDACTED]  
14 [REDACTED] and [REDACTED]  
15 [REDACTED]) primarily [REDACTED]  
16 [REDACTED]  
17 [REDACTED].

18 6. The clarifications in paragraphs 4 and 5 above do not affect any of the other  
19 statements in my November 30, 2022 declaration.

20  
21 I declare under penalty of perjury that the foregoing is true and correct.

22 Executed on the 19th day of December, 2022 at Kirkland, Washington.

23  
24 By: DocuSigned by:  
25   
26 Eugene Lee  
27  
28

# EXHIBIT A

































